

REMARKS

This is intended as a full and complete response to the Final Office Action dated July 18, 2007, having a statutory period for response which expired on January 18, 2008.¹ Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-7 are pending in the application. Claims 1-3 and 5-7 remain pending following entry of this response. Applicants have cancelled claim 4. Applicants have amended claims 1 and 6 to correct minor informalities. Additionally, claim 3 has been amended to incorporate dependent claim 4. Applicants submit that the amendments should not require any further consideration on behalf of the Examiner and do not introduce any new matter.

Claim Objections

Claims 1, 3, and 6 are objected to based on some minor informalities. In response, Applicants have amended claims 1, 3, and 6 to address the informalities pointed out by the Examiner. Accordingly, Applicants request that this objection be withdrawn.

Claim Rejections - 35 U.S.C. § 103

Claims 1, 3, 4, and 6, are rejected under 35 U.S.C. 103(a) as being unpatentable over *Christfort et al.* (U.S. Patent Pub. No. 2002/0138617) in view of "Applicant admitted prior art." Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a prima facie case of obviousness. See MPEP § 2141. Establishing a prima facie case of obviousness begins with first resolving the factual inquiries of *Graham v. John Deere Co.* 383 U.S. 1 (1966). The factual inquiries are as follows:

- (A) determining the scope and content of the prior art;
- (B) ascertaining the differences between the claimed invention and the prior art;
- (C) resolving the level of ordinary skill in the art; and

¹ Applicants have filed herewith a petition to revive due to unintentional abandonment.

(D) considering any objective indicia of nonobviousness.

Once the Graham factual inquiries are resolved, the Examiner must determine whether the claimed invention would have been obvious to one of ordinary skill in the art.

Respectfully, Applicants submit that the Examiner has not properly characterized the teachings of the references and/or the claims at issue. Accordingly, a *prima facie* case of obviousness has not been established.

Christfort discloses "a network based operating system for mobile clients." See *Christfort*, Abstract. In describing well known aspects of network computing, *Christfort* provides:

The World Wide Web includes a network of servers on the Internet, each of which is associated with one or more HTML (Hypertext Markup Language) pages. The HTML pages associated with a server provide information and hypertext links to other documents on that and (usually) other servers. Servers communicate with clients by using the Hypertext Transfer Protocol (HTTP). The servers listen for requests from clients for their HTML pages, and are therefore often referred to as "listeners".

Users of the World Wide Web use a client program, referred to as a browser, to request, decode and display information from listeners. When the user of a browser selects a link on an HTML page, the browser that is displaying the page sends a request over the Internet to the listener associated with the Universal Resource Locator (URL) specified in the link. In response to the request, the listener transmits the requested information to the browser that issued the request. The browser receives the information, presents the received information to the user, and awaits the next user request.

Traditionally, the information stored on listeners is in the form of static HTML pages. Static HTML pages are created and stored at the listener prior to a request from a web browser. In response to a request, a static HTML page is merely read from storage and transmitted to the requesting

browser. Currently, there is a trend to develop listeners that respond to browser requests by performing dynamic operations. For example, a listener may respond to a request by issuing a query to a database, dynamically constructing a web page containing the results of the query, and transmitting the dynamically constructed HTML page to the requesting browser.

Christfort, ¶¶ 0003-0005. Within this well-known computing infrastructure, *Christfort* points out that as new devices become “web-enabled” to greater or lesser degrees – it becomes difficult to develop a dynamic “web listener” that will function correctly. For example, *Christfort* describes this problem as follows:

A common problem with providing services via applications, whether they are hosted applications or portal applications, is that the application must be designed to work with all devices. However, devices will vary widely in their capabilities based on both the type of device and the particular capabilities of different models of devices of the same type or class of device. For example, a desktop computer will generally have a fully functional web browser, whereas a personal computing device will have a micro browser with limited functionality. Also, some mobile phones may have a limited display that only allows for a single word on each line of the display, while other mobile phones may have a larger display capable of showing several words on each line.

Christfort, ¶¶ 0011. The invention of *Christfort* addresses the issue of providing a service that may be accessed by many different client devices, in particular mobile phones. Specifically, *Christfort* discloses:

Techniques are provided for facilitating the creation and deployment of applications that are used to provide services for access by devices such as mobile clients. These techniques include the development of applications that can be executed on a variety of devices by tailoring the output, after it has been generated by the application, based on the

particular circumstances of the end user's use of the application, such as the capabilities of a mobile client or the network conditions existing at the time a customer requests service from the application. Also, these techniques include combining the output, capabilities, and features of services together, including techniques for allowing an end user to return to a previously accessed service. In addition, these techniques include storing data at an intermediary for access by the applications associated with a service using variables and a mapping of the variables to the stored data.

Christfort, ¶¶ 0011. The Examiner relies on the techniques for deploying a web application developed for a given mobile client to suggest that the *Christfort* reference discloses “a method of rendering an object from a text and numeric centric line of business application to a graphical user interface centric content manager client application said text and numeric centric line of business application resident on a resource manager,” having the characteristics recited by independent claims 1, 3, and 6. Respectfully, Applicants disagree with the Examiner's analysis of *Christfort*.

For example, *Christfort* does not disclose a method that includes a step of “requesting the object from a text and numeric centric line of business application,” a step of “the line of business application initiating an associated host initiated display application program interface, and calling a workstation listener, and step of “a content manager host sending customer application request to a workstation listener,” as recited by claim 1. Independent claims 3 and 6 recite a similar limitation.

First, *Christfort* does not disclose the step of “requesting the object from a text and numeric centric line of business application.” Regarding this limitation the Examiner references *Christfort*, ¶ 0067 and suggests:

“The text and numeric centric line of business application corresponds to applications discussed. [sic.] Paragraph [0063], lines 1-8, provides details about the application and discloses the line of business of the application. Also paragraphs [0087-0088], disclose the application being written in a

code, which discloses the text and numeric aspect of the line of business application.

Final Office Action, p. 3, fn1. However, the passage cited by the Examiner at paragraph [0063] merely discusses well known aspects of a web-service being hosted on a networked server computer. Specifically, this passage provides as follows:

Host server 110 may be implemented on one or more servers at an intermediary, such as a hosting service provider, also known as a host provider or simply as a host. The function of the host is to install and maintain applications, such as on host server 110, that are developed by either the host provider or other application developers. The applications are typically part of a service, such as a web site, a paging service, or a telecommunications service.

Christfort, ¶ 0063. Clearly, however, the applications running on a host server 110 are not a “text and numeric centric line of business application,” as recited by the present claims. First, the web-based server applications cited by the examiner are clearly “graphics centric application” rendered by a web-browser on a client computer (or web-enabled mobile phone). However, as pointed out by Applicants:

One challenge is interfacing a graphics centric content manager application with a text and numeric centric application, such as IBM CICS (Customer Information Control System). IBM CICS is a widely used legacy on line transaction processing (OLTP) system. CICS, together with the COBOL programming language, has formed over the past several decades the most common set of tools for building of large enterprise mainframe resident customer transaction applications. To be noted is that many of the enterprise legacy applications still in use are COBOL/CICS applications. Using the textual application programming interface provided by CICS, a programmer can write programs that communicate with online users and read from or write to customer and other records (orders, inventory figures, customer data, and so forth) in a database (usually

referred to as "data sets") using CICS facilities rather than other access methods directly.

See Application, pp. 2-3. Clearly, the web applications being developed for (and deployed on) a host server are not needed to render an "object from a text and numeric centric line of business application to a graphical user interface centric content manager."

Further, as *Christfort* does not disclose a text and numeric centric line of business application," it logically follows that this reference does not disclose the claimed step of "the line of business application initiating an associated host initiated display application program interface, and calling a workstation listener." Regarding this limitation, the Examiner references paragraphs 0087, 0094 and suggests as follows:

Examiner notes: the "development website" is associated with the hosting service) pg. 6 ¶0080, lines 5-8, *Christfort*), which initiates the software development kit (pg. 6 ¶0081, lines 5-8, *Christfort*). The SDK further provides the user with an interface.

Final Office Action, p. 3, fn2. While the examiner is correct that the "development website" is associated with the hosting service," this alone does nothing to demonstrate that *Christfort* discloses the claimed step of "the line of business application initiating an associated host initiated display application program interface, and calling a workstation listener." At paragraph 0080 *Christfort* provides as follows:

Host server 110 also includes an online software development kit 116 that services and application that developers may use to create, edit, test, deploy, and otherwise manage applications or modules associated with the hosting service. According to one embodiment, an application developer uses a browser to log into an online development website associated with the hosting service to access online software development kit 116. After logging in, online software development kit 116 provides a user interface for display on the developer's web browser. The user interface presents the user with various options, such as creating a new

application, modifying an existing application, testing an application, or deleting an existing application.

Christfort, ¶ 0080. This passage describes the rather unremarkable act of an online service that a developer may access through a web-browser. Users navigate to the web-site, enter credentials (e.g., a user name and password) and then access the web-pages associated with the “development website.”

Clearly, the “development website” does not disclose the claimed step of “initiating an associated host initiated display application program interface.” First, as discussed above, the Examiner appears to suggest that the applications developed for a given mobile phone correspond to the claimed “text and numeric centric line of business application.” However, the paragraph that the Examiner suggests discloses an operation performed by “the line of business application” does not, in fact, discuss anything about operations performed by such applications developed for a given mobile phone. Instead, the paragraph is directed to a web-site which authorized users may access. Furthermore, as claimed, initiates “an associated host initiated display application program interface.” This limitation does not recite providing the user with a user-interface as the Examiner appears to suggest. Instead, as claimed, the “line of business application” initiates an interface between one application (the line of business application) and another (the graphical user interface centric content manager client application). Thus, as claimed, the application program interface allows the two applications to communicate with one another. Accordingly, Applicants submit that the general description of the user “logging on” to a webpage and accessing content from that website fails to disclose the limitations recited by this claim.

For all the foregoing reasons, Applicants submit that *Christfort*, in view of “*Applicants Admitted prior art*”, do not disclose a “method of rendering an object from a text and numeric centric line of business application to a graphical user interface centric content manager client application said text and numeric centric line of business application resident on a resource manager,” as recited by independent claim 1. Independent claims 3 and 6 recite a similar limitation. Accordingly, Applicants submit

that these claims are allowable. Respectfully, therefore, Applicants request that these claims be allowed.

Claims 2, 5, and 7 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Christfort et al.* (U.S. Patent Pub. No. 2002/0138617) in view of “Applicant admitted prior art,” and further in view of *Moore et al.* (U.S. Patent No. 6,223,180). Applicants respectfully traverse this rejection.

Claim 2, 5, and 7 depend from independent claims 1, 3, and 6, respectively. The Examiner’s rejection of dependent claims 2, 5, and 7 incorporates the rejection of claim 1, 3, and with respect to *Christfort*, and “*Applicants Admitted prior art.*” Applicants believe that the above discussion of claims 1, 3, and 6 demonstrates that these references do not render claims 1, 3, and 6 obvious. Accordingly, the rejection of claims 2, 5, and 7 is also believed to be overcome. Withdrawal of the rejection is respectfully requested.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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